

07/19/2011



State of Utah

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Environmental Quality

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DIVISION OF ENVIRONMENTAL
RESPONSE AND REMEDIATION

Brent H. Everett
Director

1214818 - R8 SDMS

ERRC-115-11

July 19, 2011

Brian King, P.E.
Rocky Mountain Power
1407 West North Temple
Salt Lake City, Utah 84116

RE: Comments to the 3rd West Substation 2011 Upgrade Project Work Plan

Dear Mr. King:

This letter is being sent to provide comments to the *Work Plan and Appendices* for the proposed expansion of the substation at the Rocky Mountain Power 3rd West Substation facility, located at 147 South 400 West, Salt Lake City, Utah. The property is located within the site boundaries for the Vermiculite Intermountain site and is currently covered under an Environmental Covenant which requires the notification of the Utah Department of Environmental Quality (UDEQ) and the U.S. Environmental Protection Agency (EPA) if the protective cap is to be disturbed during any activity conducted at the site.

In a letter dated June 9, 2011, Joyce Ackerman, EPA On-Scene Coordinator, forwarded comments and concerns that will need to be addressed in future revisions to the *Work Plan*. While the UDEQ concurs with the comments outlined in that letter, the UDEQ additionally submits the following comments:

3.3.2 Transportation and Disposal – Once the 6-mil. polyethylene sheeting is used to cover the top portion of the loaded waste, it should then be sealed in place with duct tape or other appropriate method.

3.6.3 Dust Control – This section makes several references to “contaminated” dust. Because the site is located in an area of non-attainment for PM₁₀, the rules set out in Air Quality Rule R307-309 Non-attainment and Maintenance Areas for PM₁₀: Fugitive Emissions and Fugitive Dust are applicable to the site. All dusts originating from any disturbed source area on-site, including clean fill materials, need to be addressed with appropriate dust control measures to prevent the migration of the fugitive dusts off-site.

Appendix B Scope of Work Part V. Training and Certifications – Under the Air Quality Rule R307-309 Non-attainment and Maintenance Areas for PM10: Fugitive Emissions and Fugitive Dust opacity at the site shall not exceed 10% at the property boundary, and 20% inside the work site. Opacity observations at the site will need to be conducted by the contractor or other person familiar with EPA Method 9.

Appendix B Scope of Work Part VII. Work Activities with LA Amphiboles (Sub-grade disturbance activities Work Phase 2) Section D. 3. – This section again states that contaminated soils will be used as fill. In accordance with comments in the EPA letter, contaminated soils should not be used as fill for this project.

It is the additional responsibility of Rocky Mountain Power and their contractors to comply with all regulations and to obtain all permits required by the State of Utah (including other Divisions within UDEQ) and local governments for the demolition, excavation, and construction work described in the *Work Plan and Appendices*.

If you have any further questions regarding these comments to the *Work Plan and Appendices*, please contact **Craig Barnitz** at (801) 536-0071.

Sincerely,



Dale T. Urban, P.G.
Site Assessment Section Manager
Division of Environmental Response and Remediation

DTU/CRB/eds

cc: Greg Sorenson, Division of Air Quality
Royal Delegee, Salt Lake Valley Health Department
Joyce Ackerman, U.S. EPA, Region 8